



April 6, 2017

VIA ECF

The Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Segarra v. Kourel Restaurant Group, Inc. et al*
16-CV-8357 (LGS)
RR File No.: 007516.00082

Your Honor:

The law firm of Rivkin Radler LLP represents Defendants Kourel Restaurant Group, Inc. and Spiro Menegatos (collectively "Defendants"), in the above-referenced matter.

I write on behalf of Defendants to respectfully request a thirty (30) day extension of the discovery period, from April 21, 2017 to May 22, 2017. The parties are in the midst of settlement negotiations and believe that the additional time will allow them the opportunity to finalize agreeable terms. Moreover, the upcoming religious holidays also make scheduling depositions difficult as many of the parties observe, and often travel during this time of the year. Plaintiffs' counsel consents to this request, which is the first such request in connection with the discovery deadline.

The parties anticipate that they will either reach a settlement agreement or complete depositions within thirty (30) days' time. Therefore, I respectfully request that the deadline to complete discovery be extended to May 22, 2017. Thank you for your consideration.

Very truly yours,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read 'Scott Green'.

Scott Green

Cc: All Counsel via ECF